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December 15, 2020

Via CM/ECF

The Honorable Lois Bloom
United States District Court
Eastern District of New York

Re: Kahan v. Bank of America, N.A.
Case #: 1:20-cv-00221-DLI-JO

Dear Judge Bloom:

We represent the plaintiff in the above matter. In response to the November 24, 2020 order the parties can provide the following status update. The parties have exchanged written discovery and Bank of America, N.A. intends to move for summary judgment if given the ability to do so. The plaintiff is still evaluating a potential motion for summary judgment.

We thank Your Honor and the Court for its kind considerations and courtesies.

Respectfully submitted,

s/ Mark Rozenberg
Mark Rozenberg, Esq.

Cc: All counsel of Record vis ECF